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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TREVOR CLAYTON MORGAN,

Defendant.

CASE NO. 2:24-CR-0093 DC

STIPULATED REQUEST TO CONTINUE
HEARING AND EXCLUDE TIME PERIODS
UNDER SPEEDY TRIAL ACT; FINDINGS AND
ORDER

TIME: 9:30 a.m.
COURT: Hon. Dena M. Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on January 31, 2025, with a time exclusion for effective preparation of counsel.

2. The parties jointly request that the status conference be set for March 7, 2025, and request to exclude time between January 31, 2025, and March 7, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena Coggins, under Local Code T4 and 18 U.S.C. §3161(h)(7)(A) and (h)(7)(B)(iv).

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes over 600 pages/items of discovery. Those items include: business records; investigative

1 reports; interviews; photographs; and search warrant documents. Additionally, defense counsel
2 has reviewed some of the digital evidence in the case at the U.S. Attorney's office. The
3 investigators in this case have submitted hundreds of files to the National Center for Missing and
4 Exploited Children and recently received the results. Counsel for multiple series victims have
5 begun submitting restitution requests to the government, which will impact the judgment
6 ultimately imposed in this case.

7 b) A continuance is requested because counsel for both parties need additional time
8 for effective preparation, to address restitution issues and perform necessary research to resolve
9 the case.

10 c) Counsel for defendant believes the failure to grant a continuance in this case
11 would deny defense counsel reasonable time necessary for effective preparation, taking into
12 account the exercise of due diligence.

13 d) The government joins in the request for the continuance.

14 e) Based on the above-stated findings, the ends of justice served by continuing the
15 case as requested outweigh the interest of the public and the defendant in a trial within the
16 original date prescribed by the Speedy Trial Act.

17 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
18 et seq., within which trial must commence, the time period of January 31, 2025 to March 7,
19 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
20 T4] because it results from a continuance granted by the Court at defendant's request on the basis
21 of the Court's finding that the ends of justice served by taking such action outweigh the best
22 interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 23, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ CHRISTINA McCALL
CHRISTINA McCALL
Assistant United States Attorney

Dated: January 23, 2025

/s/ NOA OREN
NOA OREN
Assistant Federal Public Defender
Counsel for Defendant
TREVOR CLAYTON MORGAN

ORDER

The Court has read and considered the parties' Stipulation. Good cause appearing, the Court ORDERS the Status Conference set for January 31, 2025 be RESET for March 7, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable Dena Coggins. The Court hereby finds that the Stipulation, which the Court incorporates by reference into this Order, demonstrates facts that provide a basis to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]. Time is excluded under the Speedy Trial Act between January 31, 2025, and March 7, 2025.

IT IS SO ORDERED.

Dated: January 23, 2025


Dena Coggins
United States District Judge